

EXHIBIT A

STATE OF NEW YORK : COUNTY OF ERIE
SUPREME COURT :

ANDREA PRINCE
57 Drexel Road
Buffalo, New York 14214

Plaintiff

vs.

WALMART INC.
c/o CT Corporation System
111 8th Ave
New York, New York 10011

WAL-MART STORES, INC.
c/o CT Corporation System
111 8th Ave
New York, New York 10011

WAL-MART STORES EAST, L.P.
c/o CT Corporation System
111 8th Ave
New York, New York 10011

Defendant

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED AND REQUIRED to serve upon the Plaintiff's attorney, at the address stated below, a written Answer to the attached Complaint.


If this Summons is served upon you within the State of New York by personal service you must respond within twenty (20) days after service, not counting the day of service. If this Summons is not personally delivered to you within the State of New York you must respond within THIRTY (30) days after service is completed, as provided by law.

If you do not respond to the attached Complaint within the applicable time limitation stated above a Judgment will be entered against you, by default, for the relief demanded in the Complaint, without further notice to you.

This action is brought in the County of ERIE because of:

- ☒ Plaintiff's residence, or place of business;
- ☐ Defendant's residence/Business address;
- ☐ Designation made by Plaintiff.

DATED: November 23, 2020



GARY A. JOSEPH
SARLES, FREY & JOSEPH
Attorney for Plaintiff
Office, Post Office Address and Telephone
5800 Main Street
Williamsville, New York 14221
(716) 626-5200

STATE OF NEW YORK : COUNTY OF ERIE
SUPREME COURT :

ANDREA PRINCE

Plaintiff

COMPLAINT

vs.

INDEX NO.

WALMART INC.
WAL-MART STORES, INC.
WAL-MART STORES EAST, L.P.

Defendants

Plaintiff alleges upon information and belief as follows:

FIRST: That on December 23, 2017, the Plaintiff, ANDREA PRINCE, was walking on the sidewalk outside of the Walmart Store located at 3290 Sheridan Drive, Amherst, New York 14226.

SECOND: That on December 23, 2017, while walking upon the above-described premises, the Plaintiff, ANDREA PRINCE, was caused to slip and fall through no fault of her own.

THIRD: That on December 23, 2017 the premises located at 3290 Sheridan Drive, Amherst, New York 14226 was owned by and/or operated by and/or maintained by and/or repaired by the Defendant, WALMART INC., and/or the Defendant, WAL-MART STORES, INC., and/or the Defendant, WAL-MART STORES EAST, L.P., their agents, servants and/or employees.

FOURTH: That the incident described above was caused by and through the negligence of the Defendant, WALMART INC., and/or the Defendant, WAL-

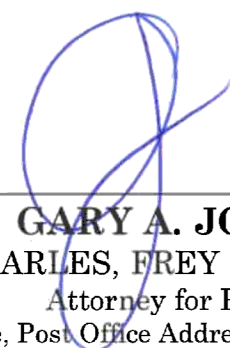
MART STORES, INC., and/or the Defendant, WAL-MART STORES EAST, L.P.,
their agents, servants and/or employees.

FIFTH: That as a result of the above incident, the Plaintiff, ANDREA PRINCE, was rendered sick, sore, lame and disabled and suffered general and special damages in an amount that exceeds the jurisdiction of any inferior court.

SIXTH: That this incident is exempt from the provisions of Section 1601 of the Civil Practice Law and Rules pursuant to the provisions of Section 1602 of the Civil Practice Law and Rules.

WHEREFORE, The Plaintiff, ANDREA PRINCE, makes claim against any or all of the Defendants named herein in a sum that exceeds the jurisdiction of any inferior court and the Plaintiff makes claim for the costs and disbursements of this action.

DATED: November 23, 2020
Buffalo, New York



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